

**From:** Christopher Racich <racich@vestigant.com>  
**Sent:** Friday, June 3, 2022 2:47 PM  
**To:** E. Meaghan Clayton; andrew.bodoh@robertslaw.org; Ian Northon; Robin Takens; Jessica Jolliffe; Heidi E. Siegmund; Scott C. Oostdyk  
**Cc:** Nicole Stoneman  
**Subject:** Protocol Production

I will be providing links to counsel for both sides for data that was responsive to the terms of the Protocol in separate emails. The production will consist of the following:

Data from Lamb01 - Mr. Lamb's iPhone 13 Pro Max  
Data from Lamb02 - Mr. Lamb's Laptop  
Data from Lamb03 - Mr. Lamb's External Hard Drive  
Data from Lamb04 - Mr. Lamb's Evernote collection

If data was solely responsive to one keyword search set (i.e. Liberty's or Lamb's), there will be CSV file with the metadata for the objects that were responsive, and if available, an AD1 container (created by Exterro's Forensic Imager) that contains the required forensic version of the data. Those AD1 files can be reviewed with FTK Imager ([https://www.exterro.com/ftk-imager#:~:text=FTK%C2%AE%20Imager%20is%20a,\(FTK%C2%AE\)%20is%20warranted](https://www.exterro.com/ftk-imager#:~:text=FTK%C2%AE%20Imager%20is%20a,(FTK%C2%AE)%20is%20warranted)) or any standard forensic software. If data was responsive to both Liberty and Lamb search terms, a CSV named "Combined" is included that shows the metadata for the files that had hits for both set of terms, but the data itself is not being provided to either counsel.

A link and password will be sent shortly to each respective counsel.

Best,

Christopher

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"If it exists, it can be found"™

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